



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 30, 2010

Mr. Todd Thompson
Restoration Coordinator
Bureau of Land Management (BLM)
P.O. Box 2965
Portland, Oregon 97208-2965

Re: U.S. Environmental Protection Agency (EPA) comments for the Vegetation Treatments using Herbicides on Bureau of Land Management (BLM) Lands in Oregon Final Environmental Impact Statement (FEIS). EPA Project Number: 08-045-BLM

Dear Mr. Thompson:

EPA has reviewed your FEIS and we are submitting comments in accordance with our responsibilities under NEPA and Section 309 of the Clean Air Act (CAA).

Our comments on the DEIS focused on monitoring and evaluation methods to determine if herbicide application rates are effective, buffers are sufficient, drift is minimized and specific goals and endpoints are being met. To this end, we recommended that Part II of Appendix 3, "Potential Monitoring" be incorporated into all action alternatives. While "Potential Monitoring" was not incorporated into all action alternatives, we would agree it makes sense that any required monitoring should be linked directly to impacts identified for the selected alternative. We agree that if the EIS has not identified adverse impacts that would need or benefit from "potential monitoring", it should not be implemented. The likelihood of meaningful monitoring results should be such that a deferral of funds from direct weed control efforts is justified.

Additional information in the FEIS on the Northwest Forest Plan Aquatic and Riparian Effectiveness Monitoring Program (AREMP), PACFISH/INFISH Biological Opinion (PIBO) Effectiveness Monitoring Program, and, National Invasive Species Information Management System (NISIMS), generally addresses our concerns about *state-wide* monitoring for the effectiveness of herbicide use against weed spread and the effectiveness of mitigation measures for protecting non-target resources. Edits to Appendix 3 which better describe existing BLM policy direction on how the critical components of a treatment area's environment should dictate site specific monitoring requirements (FEIS, p. 472) are responsive to our concern that the DEIS insufficiently disclosed minimum requirements for *site-specific* effectiveness monitoring.

Thank you for this opportunity to comment and if you have any questions or concerns please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large, stylized initial 'C'.

Christine Reichgott, Manager
Environmental Review and Sediment Management Unit